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(Additional counsel listed on next page)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

THIS DOCUMENT RELATES TO:
EUGENE E. MORRIS, ET AL. V.
NATIONAL FOOTBALL LEAGUE, ET
AL.

MDL No. 2323
Master Case No. 12-md-2323
Individual Case No. 12-cv-05210

Hon. Anita B. Brody

**STIPULATION FOR FIRST
AMENDED COMPLAINT**

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AMERICAN SPORTS
CORPORATION, d.b.a.
RIDDELL/ALL AMERICAN;
RIDDELL SPORTS GROUP, INC.
EASTON-BELL SPORTS, INC.;
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP.; RBG HOLDINGS
CORP.

1 This Stipulation is made by and between Plaintiffs and Defendants, by and
2 through their counsel of record, with reference to the following facts:

3 WHEREAS, Plaintiffs filed their Complaint in the Superior Court of the State
4 of California, Los Angeles County, on July 23, 2012;

5 WHEREAS, the Judicial Panel on Multidistrict Litigation issued a Conditional
6 Transfer Order on August 29, 2012 to transfer the case to the Eastern District of
7 Pennsylvania pursuant to Rule 7.1 of the Rules of Procedure of the United States
8 Judicial Panel on Multidistrict Litigation;

9 WHEREAS, the Conditional Transfer Order was finalized on September 6,
10 2012;

11 WHEREAS, Plaintiffs will file a First Amended Complaint in the Eastern
12 District of Pennsylvania to add further parties whom Plaintiffs contend are additional
13 similarly-situated plaintiffs;

14 WHEREAS, Defendants do not contest Plaintiffs' filing of a First Amended
15 Complaint;

16 WHEREAS, Defendants reserve their rights to argue that the consolidation of
17 multiple Plaintiffs' claims within one complaint is improper, and this stipulation is
18 without prejudice to any such objection. Moreover, Defendants' consent to Plaintiffs'
19 filing of a First Amended Complaint to add additional plaintiffs is provided in light of
20 the liberal standards for amending pleadings under Rule 15 of the Federal Rules of
21 Civil Procedure and is without waiver of—and is with total reservation of—any of
22 Defendants' defenses, arguments, and positions with regard to any iteration of the
23 Complaint, either as it currently exists or as amended, including but not limited to
24 arguments concerning timeliness and limitations of actions, failure to state a claim,
25 joinder and severance, or any other arguments. Plaintiffs will not argue, and this
26 Stipulation is not to be and cannot be taken to support any argument of purported
27 waiver of any defense positions or arguments.

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1 NOW THEREFORE, Plaintiffs and Defendants, through their counsel of
2 record, stipulate to the following:

3 IT IS HEREBY STIPULATED that Defendants consent to Plaintiffs' filing of a
4 First Amended Complaint.

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1 DATED: December 21, 2012

CASEY GERRY SCHENK
FRANCAVILLA BLATT & PENFIELD
LLP

4 By: /s/ Frederic Schenk
5 FREDERICK SCHENK

7 DATED: December 21, 2012

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

9 By: /s/ Beth A. Wilkinson
10 BETH A. WILKINSON

11 -and-
12 MUNGER, TOLLES & OLSON LLP
13 Attorneys for Defendants
14 NATIONAL FOOTBALL LEAGUE
and NFL PROPERTIES LLC


15 DATED: December 21, 2012

BOWMAN AND BROOKE LLP

17 By: /s/ Paul G. Cereghini
18 PAUL G. CEREGHINI

19 Attorneys for Defendants

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21 SPORTS CORPORATION; RIDDELL
22 SPORTS GROUP, INC.; EASTON-BELL
23 SPORTS, INC.; EASTON-BELL SPORTS,
LLC; EB SPORTS CORP.; RBG
HOLDINGS CORP.

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27 1/3/13
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel who have consented to electronic service are being served with a copy of the foregoing document via the Eastern District of Pennsylvania CM/ECF system on December 26, 2012.

/s/ Frederick Schenk

Frederick Schenk